



DISTRICT OF COLUMBIA DEPARTMENT OF CORRECTIONS

Program Statement

OPI: DIR
Number: 3310.4G
Date: June 21, 2004
Subject: Sexual Harassment
Against Employees

1. **PURPOSE AND SCOPE.** To implement an Order of the United States District Court in Bessye Neal, et al v. Margaret Moore, Director, DC Department of Corrections, Civil Action No. 93-2420, dated June 28, 1999 and to implement procedures for reporting, filing, investigating, and adjudicating claims of sexual harassment and/or retaliation relating to sexual harassment within the District of Columbia Department of Corrections. This directive applies to employees, contract employees and volunteers under the direction or control of the DC Department of Corrections (DOC).
2. **POLICY.** It is the policy of the DC Department of Corrections to prohibit sexual harassment as well as retaliation for objecting to or reporting incidents of sexual harassment.
3. **NOTICE OF NONDISCRIMINATION.** In accordance with the DC Human Rights Act of 1977, as amended, DC Code section 2.1401.01 et seq., (Act) the District of Columbia does not discriminate on the basis of race, color, religion, national origin, sex, age, marital status, personal appearance, sexual orientation, familial status, family responsibilities, matriculation, political affiliation, disability, source of income, or place of residence or business. Sexual harassment is a form of sex discrimination, which is also prohibited by the Act. Discrimination in violation of the Act will not be tolerated. Violators will be subject to disciplinary action.
4. **PROGRAM OBJECTIVES.** The expected results of this program are:
 - a. DOC employees will have a clear understanding of what constitutes sexual harassment and retaliation, what the penalties are for engaging in such conduct, and what the proper procedures are for reporting incidents of sexual harassment and related retaliation.
 - b. To explain the Office of the Special Inspector (OSI) which is responsible for promulgating policies and procedures regarding the intake, investigation and adjudication of complaints of sexual harassment and related retaliation as

well as establishing models and protocols for sexual harassment/retaliation training.

- c. DOC will take appropriate and prompt action in matters relating to sexual harassment as directed by the Special Inspector (SI).

5. **DIRECTIVES AFFECTED**

a. **Directives Rescinded**

PS 3310.4F "Sexual Harassment Against Employees" (12/22/03)

- b. **Directives Referenced.** None

6. **AUTHORITY**

- a. Order of the United States District Court in Civil Action No. 93-2420, dated 6/28/99.
- b. 31 DCR 56, "Equal Employment Opportunity Rules Governing Complaints of Discrimination in the District of Columbia Government," dated 1/6/84.
- c. Mayor's Order 79-89, "Sexual Harassment", dated 5/24/79; and the Order of the United States District Court in Civil Action No. 77-1359.
- d. DC Human Rights Act of 1977, as amended, DC Code section 2.1401.01 et seq., (Act).

7. **STANDARDS REFERENCED**

- a. American Correctional Association (ACA) 2nd Edition Standards for Administration of Correctional Agencies 2-CO-1C-11.
- b. American Correctional Association (ACA) 4th Edition Standards for Adult Local Detention Facilities 4-ALDF-7E-01.

8. **DEFINITIONS.** For the purpose of this PS, the following definitions apply:

- a. **Adverse Employment Action** — Any negative change in the terms and conditions of an employee's employment. It can include such things as transfers, shift changes, negative performance evaluations, unwarranted discipline, harassment or denial of promotion or shift requests. It also can include the creation of a hostile work environment because the employee engaged in a legally protected activity related to a claim of sexual harassment.

- b. **Cease and Desist Order** — An order prohibiting unnecessary contact between the complainant and respondent while an allegation of harassment or retaliation is investigated. However, to ensure the continued efficient operation of the agency, it does not always prohibit interaction between the complainant and the respondent as may be required to carry out the employees' respective duties and responsibilities.
- c. **Complainant** — An employee who alleges he or she is the victim of sexual harassment and/or retaliation or who files a sexual harassment and/or retaliation complaint.
- d. **Disciplinary Action/Discipline** — Action taken against employees who have violated DOC policy, rules or regulations established by the District Personnel Manual (DPM), or any District of Columbia law or regulation.
- e. **Investigators** — Persons who are specially trained by the OSI to conduct inquiries into allegations of sexual harassment and retaliation, determine the facts associated with sexual harassment and/or retaliation complaints filed with the OSI, and make recommendations of probable cause and, if applicable, disciplinary action.
- f. **Ombudsperson** — A DOC employee or contractor who assists the OSI in monitoring DOC's sexual harassment policies and procedures.
- g. **Sexual Harassment Advisory Committee** — A committee established by the OSI to provide feedback and make recommendations to the Special Inspector about policies, procedures and systemic problems related to sexual harassment and/or retaliation at DOC. The Committee also serves as a resource for individual employees with questions or concerns about sexual harassment and retaliation.
- h. **Respondent** — The employee who is accused of sexual harassment and/or retaliation.
- i. **Retaliation** — For purposes of this Policy Statement, retaliation is defined as taking or threatening to take an adverse employment action against an employee because that employee has engaged in legally protected activity.
- j. **Legally Protected Activity** — Resisting, opposing or reporting sexual harassment, making oral or written complaints about sexual harassment, or testifying in, assisting in, or otherwise participating in the investigation of a sexual harassment complaint. Such activities are protected regardless of whether the conduct complained of is ultimately proven to have constituted sexual harassment.

- k. **Sexual Harassment** – Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other conduct (verbal or physical) of a sexual nature when:
 - 1) Submission to such conduct is made a term or condition of employment, either explicitly or implicitly;
 - 2) Submission to or rejection of such conduct by an employee is used as the basis for employment decisions affecting such employee;
 - 3) Such conduct has the purpose or effect of unreasonably interfering with an employee's work performance; or
 - 4) Such conduct creates an intimidating, hostile, or offensive working environment.
- l. **Inappropriate Behavior** – The following list includes examples of sexual harassment. This list is not exhaustive, but is given to illustrate the range of conduct that must not be engaged in at work or during any work-related activities, including those that occur off-site. The list includes acts that are always sexual harassment, acts that may be sexual harassment under certain circumstances, or acts that may be inappropriate behavior for DOC employees even when not meeting the legal definition of sexual harassment.
- m. **Verbal Behavior**
 - 1) Making suggestive or sexual comments about another person's or one's own anatomy, figure, appearance, or clothing;
 - 2) Making suggestive sounds, for example, kissing, sucking, groaning, howling or other simulated sex noises;
 - 3) Asking personal questions about an employee's sex life, preferences, habits or sexual history;
 - 4) Subjecting another employee to information about your own sex life; preferences, habits or sexual history;
 - 5) Describing sexually explicit or pornographic acts, films, dreams, or fantasies;
 - 6) Asking out a person who has made it clear that she or he is not interested;
 - 7) Turning work discussions to sexual topics;
 - 8) Telling sexual or sexist jokes;

- 9) Referring to employees or other persons in sexist or sexual terms; or
- 10) Repeatedly contacting an employee at home or initiating contact outside of the workplace about non-work related matters when the employee has made it clear that she or he has no interest in such contact.

n. Non-Verbal or Physical Behavior

- 1) Looking a person up and down, fixing eyes on sexual parts of anatomy;
- 2) Giving unwanted gifts, letters, notes;
- 3) Making suggestive facial gestures, such as winking, wagging the tongue, throwing kisses, licking lips;
- 4) Simulating sex acts;
- 5) Displaying sexually explicit or sexually suggestive pictures, images, or objects;
- 6) Transmitting sexually explicit, profane, obscene, intimidating, defamatory or otherwise unlawful or inappropriate material in the office, via e-mail, or downloading such materials from the Internet;
- 7) Touching a person's body, hair or clothing;
- 8) Giving a person a massage around the neck or shoulders, hugging, kissing, patting, or stroking a person;
- 9) Touching or rubbing oneself sexually in view of another person;
- 10) Pulling another person's clothing off or up, or sticking a hand down another person's clothes, or undressing in front of or exposing oneself to another person;
- 11) Forcing another person to engage in activities such as dancing, drinking alcohol or coming to one's hotel room uninvited while on travel status; or
- 12) Putting sexually suggestive objects in a person's desk, locker or workspace.

9. GENERAL PROHIBITION AGAINST SEXUAL HARASSMENT AND RETALIATION

- a. Each DOC employee is prohibited from engaging in sexual harassment or inappropriate sexual conduct and is protected from retaliation for complaining

about or witnessing sexual harassment or conduct, as defined above, against another employee.

- b. Any employee who is found to have engaged in such conduct will be subject to discipline that, according to the severity of the offense, may include termination.
- c. Consistent with all applicable personnel laws and regulations regarding employee discipline, any corrective or adverse action against an employee for sexual harassment or retaliation will be placed in the employee's official personnel file, and will be considered a significant negative factor in DOC performance evaluations, promotion decisions and consideration for reemployment as set forth in DPM Chapter 8.

10. **OFFICE OF THE SPECIAL INSPECTOR.** The Office of the Special Inspector (OSI) was established on April 30, 2002. Carolyn Lerner is the Special Inspector (SI).

- a. **Independent Status of the OSI.** For three years after the office was established, the SI will operate independently of the DOC. The court may extend the independent status of the SI for one or two years.
- b. **Authority of the OSI.** Subject to applicable laws and regulations, the OSI has authority over all complaints of sexual harassment and/or retaliation related to such complaints. The SI has authority to determine what relief, if any, to provide to complainants and what disciplinary action, if any, to impose on respondents. The SI has the authority to hire contract investigators and trainers to work directly for the SI, as well as such other staff as may be necessary to carry out the responsibilities of the OSI.
- c. **Investigations and Findings.** OSI Investigators will investigate all complaints of sexual harassment and related retaliation and propose findings as to whether sexual harassment or retaliation has occurred. Investigators will forward their Investigative findings and recommendations to the SI who will either adopt or reject the investigators findings and recommendations.
- d. **Findings of No Probable Cause of Sexual Harassment and/or Retaliation**
 - 1) When the investigator recommends a finding of no probable cause, the investigator's Report and Recommendation ("Investigative Report") will be given to the SI. The SI may either remand the Investigative Report to the investigator for further investigation or revisions, or send a copy of the Investigative Report directly to the Complainant and Respondent at the addresses listed on their locator sheets. Receipt will be deemed effective within 3 days of mailing.

- 2) Responses to the Report of Investigation are not required. However, if they choose to submit a written response, Complainants and Respondents will each have 15 days from receipt of the Investigative Report to present any written submissions, or to request an extension of time.
- 3) The SI will review the Investigative Report along with any written submissions from a Complainant or Respondent. The SI will then either remand the Investigative Report to the investigator for further investigation or revisions, or issue findings as to whether sexual harassment and/or retaliation occurred.
- 4) If the SI determines that there is no probable cause to find that sexual harassment and/or retaliation occurred, a final decision dismissing the complaint will be issued. The SI's findings and determinations on probable cause will constitute the final decision of DOC.
- 5) If the SI determines that there is probable cause to find that sexual harassment and/or retaliation occurred, the SI will remand the Investigative Report to the investigator for proposed disciplinary action. The investigator will be the proposing official, as that term is used in DPM Chapter 16. The procedures explained below in Part "e". Findings of Probable Cause – Discipline and Relief will be followed.

e. Findings of Probable Cause – Discipline and Relief

- 1) When the investigator recommends a finding of probable cause, the investigator's Report and Recommendation ("Investigative Report") will be given to the SI. The SI may either remand the Investigative Report to the investigator for further investigation or revisions, or send a copy of the Investigative Report directly to the Complainant and Respondent at the addresses listed on their locator sheets. Receipt will be deemed effective within 3 days of mailing.
- 2) Responses to the Report of Investigation are not required. However, if they choose to submit a written response, Complainants and Respondents will each have 15 days from receipt of the Investigative Report to present any written submissions, or request an extension of time.
- 3) The SI will review the Investigative Report along with any written submissions from the Complainant and Respondent. The SI will then either remand the Investigative Report to the investigator for further investigation or revisions, or issue findings as to whether sexual harassment and/or retaliation occurred.

- 4) If the SI determines that there is probable cause to find that sexual harassment and/or retaliation occurred, the investigator will submit a request to process Corrective/Adverse Action to the Human Resources Management Division, DOC.
- 5) The investigator will be proposing official, as that term is used in DPM Chapter 16, and will have authority to propose disciplinary action against employees found to have engaged in sexual harassment and/or retaliation.
- 6) The proposed disciplinary action shall proceed under the terms of DPM Chapter 16 or under the terms of any collective bargaining agreement that may apply to the respondent. At-Will Employees, and all other employees for whom DPM Chapter 16 does not apply, will be subject to disciplinary action outside the provisions of DPM Chapter 16.
- 7) The SI's findings and determinations on probable cause, relief and discipline will constitute the final decision of DOC. Any challenge to the final decision shall proceed under either DPM Chapter 16 or the terms of any applicable collective bargaining agreement.
- 8) The SI will inform the Director or designee of the decision, and the Director or designee will immediately sign all necessary personnel related papers implementing the disciplinary ruling of the SI as the Deciding Official.
- 9) At-Will Employees, and all other employees for whom DPM Chapter 16 does not apply, will be subject to disciplinary action outside the provisions of DPM Chapter 16.

f. Relief Awarded

- 1) When the SI sustains an allegation of sexual harassment and/or retaliation, the SI may also order remedial action. In this regard, the SI may order any remedial action that the DOC Director may impose under the DC Human Rights Act.
- 2) The SI will advise the DOC Deputy Director as to the remedial measures to be taken, who will then be responsible for promptly implementing these measures.
- 3) The findings and decision of the SI constitute the final decision of the Director of DOC on the matter in question. The relief awarded to Complainant by the SI may include remedial personnel actions (including modifications of performance ratings) and back pay, but will not include compensatory damages, punitive damages, or attorneys' fees.

g. Responsibility for Policies and Training

- 1) The SI will develop and implement policies and procedures, consistent with federal and District of Columbia law, as necessary to carry out his/her responsibilities relating to claims of sexual harassment and/or retaliation.
- 2) The SI will design and make available training programs that new employees must attend promptly upon hire, and that current employees must attend at least annually. The SI and his/her staff will select trainers, training materials, schedule training sessions, and supervise all sexual harassment and retaliation training.
- 3) The SI, or the DOC Training Administrator working with the SI, will maintain records of employees who receive sexual harassment/retaliation training.

11. SEXUAL HARASSMENT ADVISORY COMMITTEE AND HOTLINE

a. Advisory Committee

- 1) The SI will establish an Advisory Committee on sexual harassment and related retaliation. The committee will meet at the SI's discretion to discuss issues brought to it by DOC employees or the SI, and to make recommendations to the SI about policies, procedures and systemic problems (not individual complaints) related to sexual harassment/retaliation at DOC.
- 2) The Advisory Committee will also provide feedback from employees to the SI regarding the effectiveness of training and other OSI programs. The SI will select members from among current DOC employees who respond to a general notice soliciting candidates, and will attempt to ensure that members represent employees from all levels and units of DOC.
- 3) The Advisory Committee members will also serve as a resource to all employees to discuss matters related to sexual harassment or related retaliation. The Advisory Committee members will keep all such communications confidential unless the employee authorizes otherwise.

b. Hotline

Employees may contact the Sexual Harassment of Employees hotline to report allegations of sexual harassment/retaliation or to receive information on procedures for pursuing a complaint. The hotline telephone number is (202) 448-2424.

12. **OMBUDSPERSON.** The SI will select either a DOC employee or contractor to serve as the Ombudsperson.
 - a. The Ombudsperson shall monitor agency compliance for the prevention of sexual harassment against employees and provide feedback to the SI on potential problem areas or actual problems that exist.
 - b. The Ombudsperson is available to employees on a confidential basis to hear concerns about possible sexual harassment or retaliation.
 - c. The Ombudsperson may also serve as a mediator for complaints.
13. **EMPLOYEE COUNSELING.** The SI will coordinate with the Employee Assistance Program (EAP), as well as outside providers when the SI deems necessary, to provide counseling support and referrals to individuals alleging sexual harassment and/or retaliation who request such assistance. Confidentiality regarding services provided will be maintained.
14. **PROCEDURES**
 - a. **Where to File a Complaint**
 - 1) Under the procedures established in this Program Statement, the SI has the authority and responsibility to receive, investigate and adjudicate internal complaints of sexual harassment and/or retaliation arising from complaints of sexual harassment.
 - 2) In addition, DOC employees retain their rights to file complaints about the same issue with the District of Columbia Office of Human Rights (OHR) and the United States Equal Employment Opportunity Commission (EEOC).
 - 3) All employees considering bringing an action outside the Department of Corrections are urged to consult legal counsel or the relevant agencies regarding his or her rights and any filing obligations. The OSI cannot and will not provide this information.
 - b. **Time Limits**
 - 1) An employee must initiate the complaint process with the OSI within one year of the incident or behavior being complained of, or in the case of ongoing or continuing behavior, within one year of the most recent incident.
 - 2) Employees may also have the right to file complaints outside the DOC

with the DC Office of Human Rights (see 31 DCR 56) or the U.S. Equal Employment Opportunity Commission within the time limits set by those agencies.

- c. **Combined Complaints of Sexual Harassment and other forms of discrimination or harassment.** The SI only has authority to investigate claims of sexual harassment and retaliation arising out of complaints of sexual harassment. If an employee has a complaint that includes other forms of discrimination or harassment, the employee must bring those complaints to other DOC offices. The SI is not required to provide guidance for complaints that do not fall within the scope of this Program Statement or within the jurisdiction of the SI.
- d. **Procedures For Complaints Submitted to the Office of Special Inspector**
 - 1) **Complaints:** The OSI will accept, investigate and adjudicate sexual harassment and related retaliation complaints that are submitted by current or former employees, provided they comply with the applicable time limits (see above). Complaints may be submitted in writing to:
 - a) Any DOC Supervisor/Office Chief/Administrator;
 - b) The DOC EEO Officer or EEO Counselor;
 - c) The DOC Deputy Director; or
 - d) The Special Inspector, either by calling the OSI Hotline at (202) 448-2424, or in writing to Carolyn Lerner, 1730 M Street, NW, Suite 412, Washington, DC 20036.
 - (1) Complaints not submitted directly to the SI will be immediately forwarded directly to the OSI without going through any chain of command.
 - (2) Any DOC supervisor who receives an oral complaint of sexual harassment and/or retaliation must instruct the employee to put the complaint in writing.
 - 2) Complaints may be submitted either by employees who believe they have experienced harassment and/or related retaliation, or by witnesses of such conduct.
 - 3) All current and former District of Columbia employees, and particularly DOC employees, are required to cooperate fully and promptly with requests by Investigators to provide interviews and other information.
 - 4) Failure of employees to attend interviews as scheduled by Investigators,

and to cooperate in OSI investigations, or failure of DOC supervisors to arrange for employee attendance, will subject the employee or supervisor to discipline. In addition, the SI may dismiss the complaint of any Complainant who does not cooperate with the investigation or who cannot be reached because they have not notified the DOC of their address or telephone number changes.

- 5) Administrative leave will be credited for time spent at interviews if the interview is not scheduled for a time on the employee's regular shift.
- 6) Complainants and their representatives will be permitted reasonable use of official time for preparation and presentation of the complaint or to attend meetings with the SI or the OSI Investigator and to attend hearings in this matter.
- 7) Each employee against whom an adverse action has been proposed will be entitled to a reasonable amount of official time to prepare his or her response, not to exceed ten (10) hours of administrative leave. Such preparation will not take place at the employee's duty station or any non-public area of a government office, unless authorized by the agency head.
- 8) **Temporary/Permanent Personnel Actions.** In his or her sole discretion, the SI may direct a DOC supervisor, Office Chief/ Administrator, Deputy Director or Director to make appropriate adjustments in working conditions of a Complainant (for example, shift, post or schedule changes) while an allegation of sexual harassment and/or retaliation is being investigated or on a permanent basis as remedial relief where the SI determines that there is probable cause that sexual harassment or retaliation has occurred.
- 9) **Mediation.** In appropriate situations as agreed to by the Complainant, Respondent and other interested parties, the OSI may recommend the use of an impartial mediator or the Ombudsperson to assist the parties in fashioning a mutually-agreeable resolution that will result in voluntary withdrawal of the complaint. Where a resolution is not possible through mediation, the Complainant may pursue a formal complaint. Where appropriate, and within the SI's sole discretion, the OSI may retain qualified mediators.
- 10) **Confidentiality.** The SI and members of the OSI (including the Ombudsperson, Advisory Committee, hotline employees, and Investigators) will keep all pre-complaint inquiries confidential, unless the employee making the inquiry expressly authorizes the OSI to disclose all or part of the matters discussed. Formal complaints, as well as all information gathered or generated in the investigation, will be kept

confidential, except that individuals with a “need to know” (such as the Complainant, Respondent, witnesses, and management officials involved in the matter) may receive access to complaints and information gathered in the investigation.

e. **What Employees Can Do if They Think They Have Experienced or Witnessed Sexual Harassment or Retaliation Related to Sexual Harassment**

- 1) To receive information about what action can be taken or simply discuss the situation: Call the OSI Hotline or contact the OSI directly to report the sexual harassment and/or retaliation you experience or observe.
- 2) Be sure to specify whether you are initiating a complaint or asking for information, and whether any portion of your conversation may be disclosed to others.
- 3) To file a complaint with the DOC Special Inspector, send it to Carolyn Lerner, 1730 M Street, NW, Suite 412, Washington, DC 20036. You may also give a complaint to one of the following, who will then forward it to the OSI. Be sure to specify that you are submitting a complaint of sexual harassment and/or retaliation and keep a copy of your complaint.
 - a) Your immediate supervisor;
 - b) DOC EEO Officer or EEO Counselor;
 - c) DOC Supervisor/Office Chief/Administrator; or
 - d) DOC Deputy Director.
- 4) Complainants may ask the SI to order interim personnel actions (temporary shift changes, post assignments) that serve to separate them from the Respondent(s) while the complaint is pending. The SI will order such actions in accordance with this Program Statement as deemed appropriate.

15. **RESPONSIBILITIES**

- a. **Special Inspector.** The SI will ensure that complaints of sexual harassment and retaliation for complaining about or witnessing sexual harassment are efficiently and accurately received, investigated and resolved as expediently as possible. At the conclusion of the investigation, the SI will issue findings as to whether there is probable cause to find that sexual harassment and/or retaliation has occurred, and, if so, order appropriate remedial action for

Complainants and discipline for Respondents. The SI will also be responsible for providing ongoing training on sexual harassment/retaliation for all DOC employees.

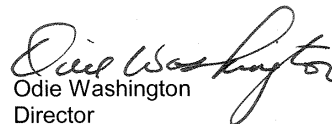
- b. **Managers and Supervisors.** All managers and supervisors are responsible for the following:
 - 1) Ensuring that the policies regarding sexual harassment and retaliation are implemented.
 - 2) Promoting a workplace that is free of sexual harassment and retaliation, and ensuring that complaints of such conduct are promptly forwarded to the OSI in accordance with this Program Statement.
 - 3) Monitoring his/her workplace to ensure that incidents of sexual harassment and/or retaliation are detected promptly and that each employee is aware of DOC's sexual harassment/retaliation policy and complaint procedures.
 - 4) Ensuring that employees who file sexual harassment complaints are protected from retaliation.
 - 5) Maintaining, to the greatest extent possible, the confidentiality of those employees who lodge sexual harassment/retaliation complaints or report evidence of sexual harassment or retaliation.
 - 6) Complying with procedures for forwarding complaints, cooperating with investigations of allegations of sexual harassment/retaliation, and carrying out remedial and disciplinary orders of the OSI.
- c. **Employees.** Each DOC employee is responsible for the following:
 - 1) Ensuring that his or her conduct is free from all forms of sexual harassment or retaliation.
 - 2) Refraining from using sexually offensive language, and from possessing sexually explicit or offensive materials (including literature, photographs, drawings), in the workplace.
 - 3) Refusing to tolerate or condone sexual harassment and/or retaliation by other employees.
 - 4) Cooperating with the OSI.

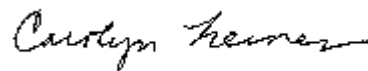
16. **PENALTIES**

- a. The SI will be responsible for ensuring that disciplinary action is taken against

persons found in violation of the agency's sexual harassment policy.

- b. Managers and supervisors who fail to report sexual harassment or fail to take appropriate action to resolve sexual harassment complaints will be subject to disciplinary action.
17. **DISSEMINATION.** The DOC will ensure that the poster explaining employee rights and procedures for filing complaints under this Program Statement is displayed permanently on all employee bulletin boards (Attachment B).
- a. Copies of this PS will be posted permanently on employee bulletin boards.
 - b. Directors and Office Chiefs/Administrators, as appropriate, will ensure that each employee under his/her authority is issued a personal copy of this PS. Receipt of this PS will be documented on the "Acknowledgement Form" (Attachment A).
 - c. Each new employee will receive a copy of this Program Statement.
18. **ANNUAL REVIEW AND CERTIFICATION.** This PS will be reviewed at least annually and revised, as necessary, by the SI.


Odie Washington
Director



ATTACHMENTS:

Attachment A – "Acknowledgment Form"
Attachment B – "Poster"